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***Counsel for Plaintiffs***

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO**

IN RE: UBER TECHNOLOGIES, INC.,  
 PASSENGER SEXUAL ASSAULT  
 LITIGATION

This Document Relates to:

*H.L. v. Uber Technologies, Inc., et al; 3:24-cv-04526-CRB*

*A.T. v. Uber Technologies, Inc., et al; 3:24-cv-05592-CRB*

*I.A. v. Uber Technologies, Inc., et al; 3:25-cv-00822-CRB*

*L.F. v. Uber Technologies, Inc., et al; 3:25-cv-01005-CRB*

*K.D. v. Uber Technologies, Inc., et al; 3:25-cv-01602-CRB*

*Halligan, Leah v. Uber Technologies, Inc., et al; 3:25-cv-02104-CRB*

*K.B. v. Uber Technologies, Inc., et al; 3:25-cv-*

Case No.: 3:23-md-03084-CRB

Hon. Charles R. Breyer

**ATTORNEY RACHEL B. ABRAMS'  
 DECLARATION IN SUPPORT OF  
 OPPOSITION TO DEFENDANTS'  
 MOTION TO DISMISS CASES FOR  
 FAILURE TO COMPLY WITH COURT  
 ORDER**

Date: October 3, 2025

Time: 10:00 a.m.

Courtroom: 6 – 17<sup>th</sup> Floor

02650-CRB

*J.M. v. Uber Technologies, Inc., et al; 3:25-cv-02689-CRB*

*Dadej, Jakub v. Uber Technologies, Inc., et al; 3:24-cv-08785-CRB*

*J.P.F. v. Uber Technologies, Inc., et al; 3:25-cv-03289-CRB*

*J.M. v. Uber Technologies, Inc., et al; 3:25-cv-03364-CRB*

*Batterson, Vanessa v. Uber Technologies, Inc., et al; 3:25-cv-03378-CRB*

*V.M. v. Uber Technologies, Inc., et al; 3:25-cv-03591-CRB*

*Lugo, Crystal v. Uber Technologies, Inc., et al; 3:25-cv-03969-CRB*

*Donaldson, Breanna v. Uber Technologies, Inc., et al; 3:25-cv-03976-CRB*

*S.S. v. Uber Technologies, Inc., et al; 3:25-cv-04143-CRB*

I, Rachael Abrams, declare as follows:

1. I am partner at Peiffer Wolf Carr Kane Conway & Wise, LLP, admitted to practice before the courts of the State of California, and I am counsel of record for the plaintiff in the above-captioned matters. I have personal knowledge of the matters set forth herein, and if called to testify, I would testify competently as to the information below.
2. This declaration is made in support of the Opposition to Defendants' Motion to Dismiss.
3. My firm has made extensive efforts to reach Plaintiffs H.L., A.T., I.A., L.F., K.D., K.B., J.P.F., and J.M. (3298).
4. Those efforts include extensive phone calls, text messages, emails, physical mailings

- 1 to last known address, and additional address searches in databases. We have also  
2 employed a private investigator to help locate these individuals. Through the database  
3 searches and private investigators, we also attempted to reach potential relatives in an  
4 effort to reach Plaintiffs H.L., A.T., I.A., L.F., K.D., K.B., J.P.F., and J.M. (3298).
- 5
- 6 5. Based on a review of our files and MDL Centrality, my firm has confirmed that Plaintiff  
7 Leah Halligan submitted both Exhibit A and Exhibit B releases on May 5, 2025, and  
8 Plaintiff J.M. (3133) submitted both Exhibit A and Exhibit B releases on April 21, 2025.  
9 We have further confirmed that the deficiency notices issued in relation to Plaintiffs  
10 Leah Halligan and J.M. (3133) did not reference the missing releases on which  
11 Defendants now base their motion to dismiss the claims brought by these plaintiffs.
- 12
- 13 6. We uploaded an updated Exhibit B release to MDL Centrality for Plaintiff Jakub Dadej  
14 on August 26, 2025.
- 15
- 16 7. We uploaded updated Exhibits A and B releases to MDL Centrality for Plaintiff  
17 Vanessa Batterson on August 26, 2025.
- 18
- 19 8. We amended the PFS and uploaded the Exhibit C release to MDL Centrality for  
20 Plaintiff V.M on August 27, 2025.
- 21
- 22 9. We uploaded the PFS verification and Exhibit B release to MDL Centrality for Plaintiff  
23 Crystal Lugo on August 26, 2025.
- 24
- 25 10. We uploaded the PFS verification to MDL Centrality for Plaintiff Breanna Donaldson  
26 on August 26, 2025.
- 27
- 28 11. We uploaded the PFS verification to MDL Centrality for S.S. on August 28, 2025.
12. Defendants' counsel did not seek to meet and confer with my firm regarding the alleged  
deficiencies related to missing releases for Plaintiffs Leah Halligan and J.M. (3133)  
that form the basis of Defendants' motion to dismiss those Plaintiffs' claims.

1 I declare under penalty of perjury that the foregoing is true and correct, and that this  
2 declaration was executed on September 4, 2025 in San Francisco, California.  
3  
4

5 Dated: September 4, 2025

Respectfully Submitted by:

6 /s/ Rachel Abrams

Rachel B. Abrams (Bar #209316)

7 Adam B. Wolf (Cal Bar No. 215914)

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**CERTIFICATE OF SERVICE**

I hereby certify that, on September 4, 2025, I electronically filed the following with the Clerk of the Court using the CM/ECF System, which will send notification of such filing via electronic mail to all counsel of record as maintained in the CM/ECF electronic system.

Dated: September 4, 2025

Respectfully Submitted by:

/s/ Rachel Abrams

Rachel B. Abrams (Bar #209316)  
Adam B. Wolf (Cal Bar No. 215914)  
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